

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

TEXAS ASSOCIATION FOR MONEY
SERVICES BUSINESSES (TAMSB),

Plaintiff,

V.

PAM BONDI, ATTORNEY
GENERAL OF THE UNITED
STATES; SCOTT BESSENT, SECRETARY
OF THE TREASURY; UNITED STATES
DEPARTMENT OF THE TREASURY;
ANDREA GACKI, DIRECTOR OF THE
FINANCIAL CRIMES ENFORCEMENT
NETWORK; FINANCIAL CRIMES
ENFORCEMENT NETWORK,

Defendants.

CIVIL ACTION NO. 25-344

Complaint for Declaratory Judgment and Injunctive Relief

PROPOSED TEMPORARY RESTRAINING ORDER

Upon consideration of Plaintiff's Emergency Motion for Temporary Restraining Order and supporting memorandum, declarations, and exhibits, the Court finds that:

1. Plaintiff has demonstrated a substantial likelihood of success on the merits of its claims under the Administrative Procedure Act, 5 U.S.C. §§ 701–706, and the Fifth Amendment to the United States Constitution;
2. Plaintiff has shown that it will suffer immediate and irreparable harm absent emergency injunctive relief, including the threat of business closure, reputational injury, and loss of customers and goodwill;

3. The balance of equities favors Plaintiff, as the requested relief merely preserves the status quo pending further judicial review, while Defendants will suffer no cognizable prejudice from a brief delay in implementation;
4. The public interest is served by maintaining lawful operations of regulated financial institutions and preventing unlawful agency action.

Accordingly, it is hereby:

ORDERED that Defendants, and their officers, agents, servants, employees, and all persons acting in concert or participation with them, are temporarily restrained from enforcing, implementing, or otherwise giving effect to the Geographic Targeting Order issued by the Financial Crimes Enforcement Network (“FinCEN”) on March 11, 2025, and scheduled to go into effect on April 14, 2025; and it is further

ORDERED that Defendants shall appear before this Court on _____, 2025, at _____ a.m./p.m., to show cause why a preliminary injunction should not issue enjoining enforcement of the GTO for the duration of this litigation; and it is further

ORDERED that Plaintiff shall not be required to post bond under Rule 65(c) of the Federal Rules of Civil Procedure, or, alternatively, that any bond requirement is set at \$100 in light of the public interest nature of this litigation; and it is further

ORDERED that this Temporary Restraining Order shall expire on _____, 2025, unless extended by the Court for good cause shown, or upon the consent of the parties.

SO ORDERED.

Dated: April __, 2025

Judge Presiding